### IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

BEARNICE N JENKINS :

aka Bernice Nadine Jenkins; aka Bernice : CASE NO. 1:13-bk-00024

N. Furry

:

**Debtor** 

# MOTION TO TERMINATE WAGE ATTACHMENT TO PAY TRUSTEE

Comes now the Debtor, Bearnice N Jenkins, by and through the Dorothy L.Mott Law Office, LLC, and moves this Court to terminate the Wage Attachment Order previously entered in this case, respectfully stating in support thereof as follows:

- 1. The Debtor filed a Chapter 13 Petition on January 3, 2013
- 2. The Debtor has completed all payments due under the plan and wishes to terminate the wage attachment.

Wherefore, the Debtor respectfully requests that this Honorable Court enter an Order terminating the Wage Attachment Order previously entered in this case.

Respectfully submitted,

/s/Dorothy L Mott

Dorothy L. Mott, Esquire, Atty ID 43568 Kara K. Gendron, Esquire, Atty ID 87577 Mott & Gendron Law 125 State Street Harrisburg, PA 17101 Tel (717)232-6650 Fax (717) 232-0477 doriemott@aol.com

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### **ORDER**

Upon consideration of the Motion to Terminate Wage Attachment filed by the Debtor in this case, and it appearing that the Debtor wishes to terminate the wage attachment, it is hereby Ordered and Decreed that the Wage Attachment Order is hereby terminated.

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**Debtor** 

#### **CERTIFICATE OF SERVICE**

I certify that on February 19, 2018 I served a copy of the foregoing document(s) on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036	Electronically
FRANKLIN COUNTY HUMAN RESOURCES DEPT ATTN: PAYROLL DIVISION 425 FRANKLIN FARM LANE CHAMBERSBURG, PA 17202	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

/s/Edith Warfel, Secretary

Mott & Gendron Law 125 State Street Harrisburg, PA 17101 Tel: (717)232-6650

Fax: (717) 232-0477